

13201 NW Freeway, Suite 220 Houston, Texas 77040 T 713.533.8511 F 281.971.0521 www.eosolutions.net

CONTENTON TENT DIV.

December 7, 2018

FedEx No.: 773916187849

US EPA Region 6 Compliance Assurance & Enforcement Division Air Enforcement Branch 1445 Ross Avenue, Suite 1200 Mail Code 6EN-A Dallas TX 75202-2733

Re: NSPS OOOOa Annual Report – 40 CFR §60.5420a(b)

Davis Gas Processing, Inc. Staley Compressor Station Reagan County, Texas CN601282502 RN102419645

Dear Sir/ Madam,

Environmental Operational Solutions LLC, on behalf of Davis Gas Processing, Inc. is submitting the 40 CFR Part 60 Subpart OOOOa "NSPS OOOOa" annual report for Staley Compressor Station for the following affected source and compliance period:

1. Unit ID: CO-301

Compliance Period: 11/21/2017 to 11/20/2018

This submittal is certified by the Responsible Official as indicated in the attached signed OP-CRO1.

If you have any questions concerning this submittal, please contact me at (713) 983-0112 or via email to elena.hofmann@eosolutions.net or Angie Eastman at (210) 315-3954 or via email to angie.eastman@eosolutions.net.

Sincerely,

Elena L. Hofmann

President

Enclosures

NSPS OOOOa Annual Report – 40 CFR §60.5420a(b) Davis Gas Processing, Inc. Staley Compressor Station Reagan County, Texas CN601282502 RN102419645 December 7, 2018 Page 2 of 2

cc: Mr. Christopher Mayben

Air Section Manager TCEQ - Region 8 622 South Oaks, Ste. K San Angelo, TX 76903-7833

FedEx No.: 773916241335

Attachment A

Certification by Responsible Official

Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

RN: RN102419645 CN: CN601282502 Account No.: SQ0070P Permit No.: PBR 28060 Project No.: N/A Area Name: Staley Compressor Station Company Name: Davis Gas Processing, Inc. II. Certification Type (Please mark the appropriate box) Responsible Official Duly Authorized Representative III. Submittal Type (Please mark the appropriate box) (Only one response can be accepted per form) SOP/TOP Initial Permit Application Dupdate to Permit Application GOP Initial Permit Application Permit Revision, Renewal, or Reopening Other: Annual Report – 40 CFR 60, NSPS OOOOa (§60.5420a(b)) (11/21/2017 to 11/20/2018) IV. Certification of Truth This certification does not extend to information which is designated by the TCEQ as information for reference only. I, Michael K. Davis , certify that I am the RO (RO or DAR)											
Area Name: Staley Compressor Station Company Name: Davis Gas Processing, Inc. II. Certification Type (Please mark the appropriate box) Responsible Official Duly Authorized Representative III. Submittal Type (Please mark the appropriate box) (Only one response can be accepted per form) SOP/TOP Initial Permit Application Dermit Revision, Renewal, or Reopening Other: Annual Report – 40 CFR 60, NSPS OOOOa (§60.5420a(b)) (11/21/2017 to 11/20/2018) IV. Certification of Truth This certification does not extend to information which is designated by the TCEQ as information for reference only. I, Michael K. Davis , certify that I am the RO (Certifier Name printed or typed) (RO or DAR)											
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(Certifier Name printed or typed) (RO or DAR)											
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:											
Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).											
Time Period: From to											
Start Date End Date											
Specific Dates: [2/6/2018											
Date 1 Date 2 Date 3 Date 4 Date 5 Date 6											
Signature:											
Title: President											

Attachment B

NSPS OOOOa 2017 - 2018 Annual Report

§60.5420a(b)(1)(i) Davis Gas Processing, Inc. §60.5420a(b)(1)(i) Staley Compressor Station §60.5420a(b)(1)(i) From Eldorado, TX: Intersection US-277 & US-190; Head East on US-190 (0.9 mile); Turn Right (S) onto RR 2596 (6.5 miles); Turn Right onto Lease Rd (3.2 miles); Turn Left onto Lease Rd (0.2 mile); Continue Straight (0.4

CN601282502 RN102419645

Annual Report - NSPS 0000a §60.5420a(b)

§60.5420a(b)(1)(ii) - Reciprocating Compressors

§60.5420a(b)(4)(ii) - list of deviations where rod packing was not replaced w/n 26,000 hours of operation or 36 months		NA					
either hours or months	cumulative number of months since the later of:	- 8/2/2016, or - 8/2/2016, or - since last rod packing replacement	24				
§60.5420a(b)(4)(i) -Track either hours or months	cumulative number of hours of operation since the later of: - initial startup, - 8/2/2016, or - since last rod packing replacement		N/A				
Date of Initial Startup or Last Rod Packing Replacement:		11/21/16					
§60.5420a(b)(1)(iii) - Compliance Reporting Period:		End Date	11/20/18				
		Start Date	11/21/17				
§60.5420a(b)(4) Reciprocating Compressor Unit ID		CO-301					